



February 24, 2012

Via ECFS

Marlene Dortch  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: CC Docket 91-281, *Petition for Waiver of Section 64.1601(b)—Blocked Telephone Numbers*

Dear Ms. Dortch:

I submit the following comments in response to the FCC Public Notice DA 12-210 dated 14 February.

The Public Notice solicits “comment on whether there are technical or other solutions that might enhance Hatzalah’s ability to locate callers that have blocked CPN without the necessity of waiving the Commission’s rules.”

Yes, there are. The Petitioner could acquire and publish a toll-free (8YY) number as the number to be called to reach them in emergency situations.

The FCC has already declared that calling-party information can be revealed on calls placed to 8YY subscribers, regardless of the privacy indicator set by the caller.

Informed members of the public have come to know that privacy protections are not applicable for 8YY calls (and 911 calls), and details about this are readily available via Internet search and other sources.

The FCC should not be asked to micro-manage our networks. The FCC should focus on the fewest number of simple, clear rules that promote efficient communications. The FCC should give power to the users to decide how to best use the networks to meet their own needs and preferences.

With respect to calling-line identification:

- Internal to the public telephone network, all calls should be properly identified. No provider should be permitted to put a call into the network without valid identifying information.
- A caller should be able to indicate that they do not want their identification revealed, and providers should be required to honor that indication when delivering a call to the end-user.
- There can be (hopefully only a few) established and well-documented exceptions to this: 911 and toll-free calls (recognized by the 8YY area codes), and law enforcement (including the call-trace capability). There should be no “mystery” about when calling identification might be revealed if it is otherwise designated as blocked.
- End-users concerned about receiving threatening, obscene, or other undesired calls from blocked callers should avail themselves of technology that “blocks the blocker” and insist that all callers reveal their identity. (This would seem relevant to the NASA request.)

For the Petitioner in this case, there is likely a small incremental expense associated with receiving calls on an 8YY number. However, the expense of a 10-minute toll-free call seems miniscule given the grander cost of rolling a sophisticated ambulance with qualified medical personnel. It is a solution that is already available, is applicable to any other similarly-situated private emergency services provider (or any other entity that wants caller identification), and gives the caller “fair warning” that their number can be revealed. As the FCC reforms inter-carrier compensation, any incremental expense for 8YY service should come down further.

Regards,

A handwritten signature in black ink, appearing to read "David Frankel".

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